

REMARKS

This Amendment is being filed in response to the Office Action mailed November 29, 2006, which has been reviewed and carefully considered. Reconsideration and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

In the Office Action, the Examiner objected to claim 12 for a certain informality. In response, claim 12 has been amended in accordance with the Examiner's suggestions. Accordingly, withdrawal of the objection to claim 12 is respectfully requested.

In the Office Action, claims 1 and 13 are rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent No. 5,708,961 (Hylton). Claims 2 and 14 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Hylton in view of U.S. Patent No. 6,956,833 (Yukie). Claims 3-8 and 15-20 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Hylton in view of Yukie and U.S. Patent No. 6,081,533 (Laubach). Claims 9-12 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Hylton in view of Yukie, Laubach and U.S. Patent No. 5,990,927

(Hendricks). Claim 21 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Hylton in view of Yukie and U.S. Patent No. 6,630,963 (Billmaier). Claim 22 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Laubach in view of U.S. Patent Application Publication No. 2004/0261112 (Hicks III). Claim 23 is rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Laubach in view of Hicks III and Hendricks. Claims 24-27 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Hylton in view of Hendricks. It is respectfully submitted that claims 1-27 are patentable over Hylton, Yukie, Laubach, Hendricks, Billmaier and Hicks III for at least the following reasons.

Hylton is directed to a wireless video distribution system using digital multiplexing. As shown in FIG 1, a shared processing center 10 is connected to a digital broadband network 5 and includes a multiplexer 15. As recited on column 6, lines 7-11 and 18-25, the multiplexer 15 combines selected program into a transport stream for modulation by a modulator 17 and wireless transmission (via antenna 27) to set-top terminals 100.

As recited on column 8, lines 2-5, each set-top terminal 100 includes a transport interface module (TIM) 101 and a digital

entertainment terminal (DET) 102. As recited on column 8, lines 11-15, the TIM 101 wirelessly receives (via antenna 29) the transport stream from the shared processing center 10 for decoding by the DET 102. Thus, instead of each set-top terminal 100 being directly connected to the service provider or network 5, only one direct connection is used between the shared processing center 10 and service provider (for wireless transmission of transport stream to multiple set-top terminals 100).

Laubach is directed to a method and apparatus for enhancing the functionalities of a subscriber terminal unit (STU). In particular, the STU includes a slot for insertion of a detachable application interface module (AIM). A specific STU functionality is achieved depending on the type of the AIM inserted in the STU. As correctly noted by the Examiner on page 11, last two lines of the Office Action, Laubach does not teach or suggest wireless connection between a removable module and both a set top box and with the network. Hicks III is cited in an attempt to remedy the deficiencies in Laubach.

Hicks III is directed to a system and method for multimedia on demand services where a data switch 101 receives a digital

multimedia information signal via a data link 2, as recited on page 4, paragraph [0042]. The Hicks system includes wireless transceivers 142, 143, 144 for wireless transmission of data from the switch 101 to various appliances, such as an audio system 60, an electronic book device 70 and an MP3 player 80.

It is respectfully submitted that Hylton, Laubach, Hicks III, and combinations thereof, do not teach or suggest the present invention as recited in independent claim 1, and similarly recited in independent claims 13 and 22 which, amongst other patentable elements requires (illustrative emphasis provided):

a removable circuit apparatus capable of being inserted into ... said digital cable set-top box ... said removable circuit apparatus comprising:

a point of deployment (POD) module interface capable of mating with said POD host interface; and

an RF transceiver coupled to said POD module interface capable of:

receiving an incoming baseband signal from said digital cable set-top box, said digital cable set-top box being configured to directly receive a provided RF signal provided by a service provider, and said incoming baseband signal being downconverted from said provided RF signal.

It is respectfully submitted that Hylton, Laubach, and Hicks

III, alone or in combination, do not teach or suggest a set-top box which is configured to directly receive signals from a service provider, and to include a removable circuit having a transceiver to wirelessly transmit and/or receive signals.

Rather, Hylton merely teaches a plug in module TIM 101 inserted into a DET 102, where the DET 102 (that includes the removable plug in module TIM 101) is NOT directly connected or does NOT directly receive signals from a service provider. In Hylton, it is the shared processing center 10 which is connected to, and receives signals from, a digital broadband network 5. It should be noted that the plug in module TIM 101 is NOT inserted in the shared processing center 10 which receives signals from the service provider. Thus, a set-top which is directly connected to a service provider and itself includes a removable circuit apparatus, where the removable circuit apparatus wirelessly transmits and/or receives signals is nowhere taught or suggested in Hylton.

Further, the combination of Laubach and Hicks III, at best, teaches a subscriber terminal unit (STU) having an inserted detachable application interface module (AIM) where, (when Laubach is combined with Hicks III) the STU (and NOT any detachable module

or AIM) wirelessly communicates with remote appliances. A removable module having wireless connections with both the set top box and the network, where the removable module is inserted into the set top which is configured to directly receive signals from a service provider, is nowhere taught or suggested in Hylton, Laubach, Hicks III, and combinations thereof. Yukie, Hendricks and Billmaier are cited in rejecting dependent claims to allegedly show other features and do not remedy the deficiencies in Hylton, Laubach, Hicks III.

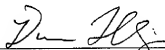
Accordingly, it is respectfully requested that independent claims 1, 13 and 22 be allowed. In addition, it is respectfully submitted that claims 2-12, 14-21 and 23-27 should also be allowed based at least on their dependence from independent claims 1, 13 and 22.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position,

should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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February 26, 2007

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